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November 9, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Magalie R. Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)**  
**Policy Division**  
**Wireless Telecommunications Bureau**

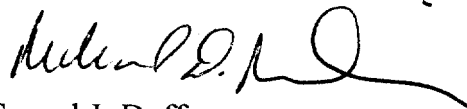
**Re: Minnesota PCS Limited Partnership**  
**Implementation Plans of Wireless E911 Phase II Automatic**  
**Location Identification**  
**Notice Pertaining to CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of Minnesota PCS Limited Partnership, we are submitting herewith its Report on Implementation of Wireless E911 Phase II Automatic Location Identification.

Please direct any questions or correspondence regarding this filing to our office.

Very truly yours,



Gerard J. Duffy  
Richard D. Rubino

Attachment

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**MINNESOTA PCS LIMITED PARTNERSHIP**  
**13810 24<sup>th</sup> Avenue North**  
**Plymouth, MN 55441**

Magalie R. Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)**  
**Policy Division**  
**Wireless Telecommunications Bureau**

**Re: Implementation Plans of Wireless E911 Phase II Automatic**  
**Location Identification**  
**Notice Pertaining to CC Docket No. 94-102**

**E911 PHASE II STATUS REPORT**

Dear Ms. Salas:

In accordance with the Third Report and Order in Docket No. 94-102 and the Commission's related Public Notice, Mimeo No. DA00-2099 (released September 14, 2000), we hereby submit our report on the status of implementation plans for Wireless E911 Phase II Automatic Location Information, as follows:

***a. Background/Contact Information***

- 1) Carrier Identifying Information: Minnesota PCS Limited Partnership  
TRS Number: 818842
- 2) Contact Information: Gerard J. Duffy, Esq.  
Richard D. Rubino, Esq.  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037  
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***b. E911 Phase II Location Technology Information***

Minnesota PCS Limited Partnership (“Minnesota”), a limited partnership organized under the Minnesota 1976 Uniform Limited Partnership Act, is comprised of several Minnesota rural telephone companies. Minnesota is the licensee of the following stations listed below in the Broadband Personal Communications Service.

<b>BTA Market</b>	<b>Frequency Block</b>	<b>Call Sign</b>	<b>Market Name</b>
BTA037	F	KNLF934	Bemidji, MN
BTA234	F	KNLG949	La Crosse, WI
BTA277	F	KNLG950	Mankato, MN
BTA378	F	KNLG954	Rochester, MN
BTA481	C1	KNLF485	Worthington, MN
BTA464	F	KNLG952	Watertown, SD
BTA477	C1	KNLF368	Wilmar, MN
BTA481	F	KNLG953	Worthington, MN
BTA054	C1	KNLF389	Brainerd, MN
BTA054	D	KNLG955	Brainerd, MN
BTA119	F	KNLG951	Duluth, MN
BTA123	F	KNLG947	Eau Claire, WI
BTA138	C1	KNLF641	Fargo, ND
BTA142	C1	KNLF388	Fergus Falls, MN
BTA142	F	KNLG948	Fergus Falls, MN
BTA166	C1	KNLF642	Grand Forks, ND

Minnesota launched its PCS service under the “trade name” Wireless North, and uses Motorola’s CDMA equipment in its wireless network. Minnesota is therefore largely dependent upon Motorola for the testing and/or approval of Phase II ALI solutions to be used in its network.

Minnesota has not received any requests from PSAPs for Phase II service. It has, however, received a request from Grand Forks County, North Dakota for E911 Phase I service.

Minnesota takes its obligation to provide enhanced 911 services seriously and is committed to working with its equipment vendor and the public safety community to make Phase II ALI capability available to its customers as soon as practicable.

## **1. Type of Technology:**

Minnesota has selected a network-only E911 Phase II solution which is manufactured by XYPOINT Corporation. Under the XYPOINT system, a caller places an emergency call to “9-1-1.” The WSP receives the call and launches a query to XYPOINT for call routing information. In order to provide the call routing information, XYPOINT extracts the call back number of the PCS handset and the cell site location from the query. XYPOINT then launches a query to the LDT provider in order to obtain the geographic coordinates of the caller. The LDT provider provides the geographic coordinates and the XYPOINT converts the geographic coordinates to a street address (or a range of street addresses, e.g., 400 block of 12<sup>th</sup> Street, S.W.) and stages the call back number and location record. XYPOINT then formats and sends the call routing information to the WSP.

It should be noted that the emergency 9-1-1 call will be completed as normal, routing through the LEC to the PSAP, which launches the query for the call-back and location information of the caller. The requested information will be displayed on the 9-1-1 telecommunicator’s computer screen, with street address detail. A more detailed description of this system is available on the XYPOINT website.

## **2. Testing and Verification**

Testing to verify the Phase II capability will be conducted in accordance with the Empirical Testing Method per OET Bulletin No. 71 and the equipment manufacturer’s requirements.

## **3. Implementation Details and Schedule**

Minnesota has not yet developed a roll-out schedule for its E911 Phase II. In this regard, Minnesota has not receive a request from the PSAP for E911 E911 Phase II. Nonetheless, once Minnesota receives a request from the PSAP, it anticipates that it will be able to adhere to the implementation schedule established by the FCC in the Fourth Memorandum Opinion and Order in CC Docket 94-102. The ability to do so will depend, in large part, on the ability of the equipment manufacturers to have their products operational and delivered on time.

## **4. PSAP Interface**

As noted above, with the exception of a Phase I service request from Grand Forks County, North Dakota, Minnesota has not received any PSAP requests for Phase I or Phase II service. However, Minnesota has contracted with GTE TSI to deploy the INPosition Wireless 911 bureau solution, which will permit Minnesota to automatically locate wireless 911 callers and route them to the proper PSAP. INPosition meets the FCC’s E911 Phase I requirements and offers an efficient migration path to meeting the FCC’s E911 Phase II requirements. The INPosition Wireless 911 service utilizes the wireless intelligent network and will not require Minnesota to install any additional hardware in order to comply with the FCC’s E911 Phase II requirement. In this regard, Minnesota is working with Grand Forks County and GTE TSI to provide the requested E911 Phase I service.

**5. Existing Handsets**

Not applicable. Minnesota is proposing to utilize a network-based solution which will have no impact on the handsets used by its subscribers.

**6. Location of Non-Compatible Handsets**

Not applicable. Minnesota is proposing to utilize a network-based solution which will have no impact on the handsets used by its subscribers.

**7. Other Information**

In order to ensure that Minnesota timely achieves compliance with the Commission's E911 requirements, it will continue to consult with industry sources, especially other rural telephone companies engaging in the provision of broadband PCS services, in order to stay abreast of developments and problem areas in the E911 arena.

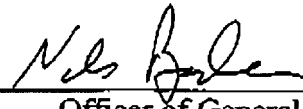
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Minnesota stands ready to implement E911 Phase II service in accordance with the Commission's Rules. Minnesota will remain in contact with its local PSAPs, and as necessary will update this report to keep the Commission apprised of its progress.

Respectfully submitted,

**MINNESOTA PCS LIMITED PARTNERSHIP**

By



\_\_\_\_\_  
Officer of General Partner

Dated: November 9, 2000